

Defendant	Number of Documents
AIR Communities	* ¹
Allied Orion	448
Apartment Management Consultants	81
Avenue5	*
Bell Partners ²	17
BH Management	264
Bozzuto Management	370 ³
Brookfield	10
Camden Property Trust	56,778
CH Carter-Haston	4
ConAm	11
CONTI	*
Cortland	135,709
CWS	44
Dayrise	27
ECI Management, LLC	59
Equity Residential	4,887
Essex	138
First Communities	15,116
FPI Management	11*
Greystar	11 ⁴
Highmark Residential	11,207
IRT	17
Kairoi	24
Knightvest	12
Lantower	18
Lincoln Property Co. (Willow Bridge)	33,027
MAA	6 ⁵

¹ A * denotes Defendants for whom discovery is stayed pending settlement negotiations or who have reached settlements in principle.

² Bell Partners is producing its only government production, a CID response to the Washington DC AG, prior to the September 13, 2024, status conference.

³ By the September 13, 2024 status conference, Bozzuto will have produced nearly 20,000 documents to Plaintiffs.

⁴ By the September 13, 2024, status conference, Greystar will have produced over 127,000 documents to Plaintiffs, and intends to make an even larger production before the October 12, 2024, status conference.

⁵ MAA intends to make a production of over 30,000 documents as early as today (September 6, 2024), and a second sizable production next week.

Defendant	Number of Documents
Mission Rock	385
Morgan Properties	229
Pinnacle	*
Prometheus	11
RealPage	821,386
Rose Assocs ⁶	2
RPM	43,662
Sares Regis	256
Security Properties	81,698
Sherman	129
Simpson	22
Thoma Bravo	1,080
The Related Cos	5
Thrive Communities ⁷	17
Trammell Crow and Crow Holdings	331
UDR	1,050
Windsor	225,530
Winn	132
ZRS	149
TOTAL:	1,434,373

⁶ Rose has produced 39 documents (1,923 pages of documents), but Plaintiffs contend Rose's productions do not comply with the ESI order and therefore refer to this production as "2" documents here. The parties are working on resolving this issue.

⁷ Thrive intends to supplement its document production prior to the September 13, 2024, status conference with a sizable production.